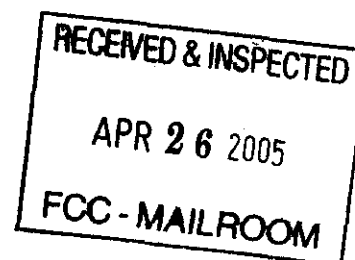




Minnesota Chapter

APCO International



Ms. Marlene Dortch

Secretary

Federal Communications Commission

445 12th Street, SW

Washington, DC 20554

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RE: WT Docket 94-102

Dear Ms. Dortch:

At the request of the 279 public safety professionals who are members of the Minnesota Chapter of the Association of Public-Safety Communications Officials, International (APCO), I hereby file these comments in response to the Federal Communications Commission's request for comment on the *Report on Technical and Operational Issues Impacting the Provision of Wireless Enhanced 911 Services* submitted by Dale Hatfield in the "Hatfield Report." These comments are submitted with great concern and it is our hope that the Commission will acknowledge the significant challenges facing our Public Safety Answering Points daily.

In the "Hatfield Report", Mr. Hatfield stresses the necessity for standardized testing and more importantly end-to-end testing of the wireless E9-1-1 systems. Minnesota APCO supports his opinion and respectfully requests the Commission's attention to this critical component of 9-1-1 services. Wireless 9-1-1 accuracy testing should be conducted and reported at the local or PSAP level. Some wireless carriers assert tremendous difficulties in achieving these goals; however it is not a matter of IF testing can be done at a local level, but rather that such local testing **SHOULD** be done. Unfortunately, the local testing model apparently does not fit in the wireless carrier business plan. We can appreciate that such local testing requirements might pose challenges for the wireless carrier. They certainly pose issues and challenges to the local PSAP as well. Public Safety and the wireless carrier need to work together to achieve appropriate testing for a jurisdiction in order for public confidence in the wireless 911 system be achieved. Without local testing and reporting, the public's safety is compromised. Too large a testing area will leave some public safety answering points with information about accuracy that is so poor it is relatively useless. To be relevant, compliance testing must be conducted at a local level, or at the very most a county or MSA level. State level testing, or worse, nationwide testing as some carriers are seeking, is all but worthless for local dispatch.

Public confidence in 9-1-1 services has been long established. The public expects and deserves to have public safety respond promptly. In order for emergency services to arrive in the most efficient manner, in order for precious resources not be squandered, in order that the public's call for help can be appropriately responded to, end-to-end testing needs to be performed on a local basis. We urge your prompt action on the APCO Petition for Declaratory Ruling on Wireless Accuracy.

Respectfully submitted,

Rick Juth, President

Minnesota Chapter of the Association of Public-Safety Communications Officials

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